

# Exhibit G

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6 *Interim Lead Counsel for the Direct Purchaser*  
7 *Plaintiffs*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
11

12 IN RE: CATHODE RAY TUBE (CRT)  
13 ANTITRUST LITIGATION

MASTER FILE NO. 07-cv-5944 SC

MDL NO. 1917

14 This Document Relates to:  
15 ALL DIRECT PURCHASER ACTIONS  
16

**PLAINTIFF RADIO & TV EQUIPMENT,  
INC.'S RESPONSES TO DEFENDANT  
HITACHI AMERICA, LTD.'S FIRST SET  
OF INTERROGATORIES**

17  
18 PROPOUNDING PARTY: HITACHI AMERICA, LTD.

19 RESPONDING PARTY: PLAINTIFF RADIO & TV EQUIPMENT, INC.

20 SET NO.: ONE

21 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Radio & TV  
22 Equipment, Inc. ("Plaintiff"), by its attorneys, objects and responds to Defendant Hitachi America,  
23 Ltd.'s First Set of Interrogatories to the Direct Purchaser Plaintiffs (the "Interrogatories") as  
24 follows:

25 **GENERAL OBJECTIONS**

26 Each of the following objections is incorporated by reference into each of the responses  
27 herein:  
28

1           1.       Plaintiff and its counsel have not completed their (1) investigation of the facts  
2 relating to this case, (2) discovery in this action, or (3) preparation for trial. The following  
3 responses are therefore based upon information known at this time and are provided without  
4 prejudice to Plaintiff's right to supplement these responses prior to trial or to produce evidence  
5 based on subsequently discovered information. Likewise, Plaintiff's responses are based upon,  
6 and therefore limited by, Plaintiff's present knowledge and recollection, and consequently,  
7 Plaintiff reserves the right to make any changes in these responses if it appears at any time that  
8 inadvertent errors or omissions have been made.

9           2.       Plaintiff generally objects to the Interrogatories, including the Instructions and  
10 Definitions, to the extent they purport to enlarge, expand or alter in any way the plain meaning and  
11 scope of any interrogatory or to impose any obligations on Plaintiff's responses in excess of those  
12 required by the Federal Rules of Civil Procedure. Plaintiff will respond to these Interrogatories in  
13 accordance with its understanding of the obligations imposed by the Federal Rules of Civil  
14 Procedure.

15           3.       Plaintiff objects to the Interrogatories, including the Instructions and Definitions, to  
16 the extent the information sought is protected by the attorney-client privilege, the attorney work  
17 product doctrine, or is otherwise privileged and/or immune from discovery. By responding to  
18 these Interrogatories, Plaintiff does not waive, intentionally or otherwise, any attorney-client  
19 privilege, attorney work-product or any other privilege, immunity or other protection that may be  
20 asserted to protect any information from disclosure. Accordingly, any response or production of  
21 documents or disclosure of information inconsistent with the foregoing is wholly inadvertent and  
22 shall not constitute a waiver of any such privilege, immunity or other applicable protection.

23           4.       Plaintiff objects to the Interrogatories to the extent they fail to state with sufficient  
24 particularity the information and categories of information to be provided.

25           5.       Plaintiff objects to the Interrogatories to the extent they request Plaintiff to produce  
26 documents outside its possession, custody, or control.

27           6.       Plaintiff objects to the Interrogatories to the extent they are overly broad and  
28 unduly burdensome.

1           7.       Plaintiff objects to the Interrogatories to the extent they are vague, ambiguous,  
2 redundant, harassing or oppressive.

3           8.       Plaintiff objects to the Interrogatories to the extent they require Plaintiff to draw  
4 legal conclusions.

5           9.       Plaintiff objects to the Interrogatories to the extent the information requested is  
6 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

7           10.      Plaintiff objects to the Interrogatories to the extent that they, or any portion of  
8 them, seek production of any information within the possession, custody, or control of any  
9 Defendant, or of publicly available information such that the information is obtainable from some  
10 other source that is more convenient, less burdensome or less expensive, or the production of the  
11 information will impose undue burden, inconvenience, or expense upon Plaintiff.

12          11.      Plaintiff objects to each and every interrogatory and also to the instructions  
13 accompanying them, to the extent they seek to require Plaintiff to produce all information that  
14 supports or otherwise relates to specific contentions in this litigation, on the ground that such  
15 contention interrogatories are unduly burdensome and premature at this stage of the litigation.

16          12.      Plaintiff objects to the Interrogatories to the extent that they seek information  
17 relating to the sales or use of CRT(s) and/or CRT PRODUCT(s) acquired by Plaintiff, or other  
18 such downstream data, because such information is not relevant to the claim or defense of any  
19 party. *See, e.g., In re Vitamins Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C. 2000); *In re Pressure*  
20 *Sensitive Labelstock Antitrust Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa. 2005). Additionally,  
21 information other than that related to direct purchases of CRT Products from the named  
22 defendants in this action has been barred by the United States Supreme Court, *Illinois Brick Co. v.*  
23 *Illinois*, 431 U.S. 720 (1977).

24          13.      Plaintiff objects to the Interrogatories to the extent that they seek information that  
25 requires expert opinion. Plaintiff is entitled to provide additional evidence that is responsive to  
26 one or more of the interrogatories in the form of expert reports at the appropriate time, and no  
27 response should be construed to foreclose any such disclosure.

28          14.      Plaintiff reserves the right to modify their allegations based on additional

1 discovery, additional analysis of existing discovery, discovery not yet completed and/or expert  
2 discovery, and Plaintiff reserves the right to supplement and/or delete the responses given in light  
3 of further evidence and further analysis of present and subsequently acquired evidence.

4 15. In addition, in accordance with the Federal Rules of Civil Procedure, Plaintiff  
5 reserves the right to introduce evidence not yet identified herein supporting Plaintiff's allegations,  
6 including evidence that Plaintiff expects to further develop through the course of discovery and  
7 expert analysis.

8 16. In providing responses to the Interrogatories, Plaintiff reserves all objections as to  
9 competency, relevance, materiality, privilege, or admissibility as evidence in any subsequent  
10 proceeding in, or trial of, this or any other action for any purpose whatsoever.

11 17. No incidental or implied admissions are intended in these responses. Plaintiff's  
12 response to all or any part of any Interrogatory should not be taken as an admission that: (a)  
13 Plaintiff accepts or admits the existence of any fact(s) set forth or assumed by the Interrogatory; or  
14 (b) Plaintiff has in its possession, custody or control documents or information responsive to that  
15 interrogatory; or (c) documents or information responsive to that interrogatory exist. Plaintiff's  
16 response to all or any part of an Interrogatory also is not intended to be, and shall not be, a waiver  
17 by Plaintiff of all or any part of its objection(s) to that interrogatory.

18 18. Plaintiff objects to the interrogatories to the extent they are duplicative of  
19 interrogatories served by other defendants in this litigation. To the extent these interrogatories  
20 seek answers that are duplicative to those requested by other interrogatories that have already been  
21 propounded on the direct purchaser class, or served at the same time as these interrogatories, the  
22 direct purchaser plaintiffs will only answer them once.

23 19. Plaintiff objects to these interrogatories to the extent that the cumulative requests  
24 by all defendants in this litigation exceed the permissible number set forth in the Federal Rules.

25  
26  
27  
28

**RESPONSES**

**INTERROGATORY NO. 1:**

IDENTIFY all PERSONS who participated or assisted in the preparation of YOUR responses to these interrogatories.

**RESPONSE TO INTERROGATORY NO. 1:**

Plaintiff incorporates the General Objections as though fully set forth herein. Subject to, and without waiving, the foregoing objections, Plaintiff responds as follows:

Bruce Holtan, President of Radio & TV Equipment, Inc.  
615 North Shore Drive  
Detroit Lakes, Minnesota  
56501

**INTERROGATORY NO. 2:**

Separately identify each CRT that YOU sold during the RELEVANT PERIOD, including without limitation the date and place of sale, the type and manufacturer of each CRT sold, and the IDENTITY of each PERSON involved in the sale and the time period and nature of each PERSON's involvement.

As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports YOUR response.

**RESPONSE TO INTERROGATORY NO. 2:**

Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly broad and unduly burdensome. Plaintiff further objects to this interrogatory on the ground that it seeks information entirely irrelevant to the issues raised and damages claimed in this case and is not likely to lead to the discovery of admissible evidence. Plaintiff further objects and will not respond to this interrogatory because it impermissibly calls for downstream information concerning sales of CRTs by Plaintiff and such information is not relevant to the claims or defenses of any party. *See, e.g., In re Vitamins Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C. 2000); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa. 2005).

1 **INTERROGATORY NO. 3:**

2 Separately identify each CRT PRODUCT that YOU sold during the RELEVANT  
3 PERIOD, including without limitation the date and place of sale, the type and manufacturer of  
4 each CRT PRODUCT sold, and the IDENTITY of each PERSON involved in the sale and the  
5 time period and nature of each PERSON's involvement.

6 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
7 YOUR response.

8 **RESPONSE TO INTERROGATORY NO. 3:**

9 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
10 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
11 broad and unduly burdensome. Plaintiff further objects to this interrogatory on the ground that it  
12 seeks information entirely irrelevant to the issues raised and damages claimed in this case and is  
13 not likely to lead to the discovery of admissible evidence. Plaintiff further objects and will not  
14 respond to this interrogatory because it impermissibly calls for downstream information  
15 concerning sales of CRTs by Plaintiffs and such information is not relevant to the claims or  
16 defenses of any party. *See, e.g., In re Vitamins Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C.  
17 2000); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa.  
18 2005).

19 **INTERROGATORY NO. 4:**

20 For each sale of a CRT identified in Interrogatory No. 2, state all terms and conditions that  
21 were a part of the sale, including without limitation all terms and conditions RELATING TO  
22 pricing, taxes, tariffs, duties, freight charges, or any other fees paid by any PERSON in connection  
23 with the sale.

24 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
25 YOUR response.

26 **RESPONSE TO INTERROGATORY NO. 4:**

27 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
28 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly

1 broad and unduly burdensome. Plaintiff further objects to this interrogatory on the ground that it  
 2 seeks information entirely irrelevant to the issues raised and damages claimed in this case and is  
 3 not likely to lead to the discovery of admissible evidence. Plaintiff further objects and will not  
 4 respond to this interrogatory because it impermissibly calls for downstream information  
 5 concerning sales of CRTs by Plaintiffs and such information is not relevant to the claims or  
 6 defenses of any party. *See, e.g., In re Vitamins Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C.  
 7 2000); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa.  
 8 2005).

9 **INTERROGATORY NO. 5:**

10 For each sale of a CRT PRODUCT identified in Interrogatory No. 3, state all terms and  
 11 conditions that were a part of the sale, including without limitation all terms and conditions  
 12 RELATING TO pricing, taxes, tariffs, duties, freight charges, or any other fees paid by any  
 13 PERSON in connection with the sale.

14 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
 15 YOUR response.

16 **RESPONSE TO INTERROGATORY NO. 5:**

17 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
 18 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
 19 broad and unduly burdensome. Plaintiff further objects to this interrogatory on the ground that it  
 20 seeks information entirely irrelevant to the issues raised and damages claimed in this case and is  
 21 not likely to lead to the discovery of admissible evidence. Plaintiff further objects and will not  
 22 respond to this interrogatory because it impermissibly calls for downstream information  
 23 concerning sales of CRTs by Plaintiffs and such information is not relevant to the claims or  
 24 defenses of any party. *See, e.g., In re Vitamins Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C.  
 25 2000); *In re Pressure Sensitive Labelstock Antitrust Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa.  
 26 2005).

27 **INTERROGATORY NO. 6:**

28 Separately for each DEFENDANT and "co-conspirator" alleged in the COMPLAINT,

1 including without limitation their subsidiaries and affiliates, state for each calendar year of the  
2 RELEVANT PERIOD the gross dollar amounts, unit volumes, and types of CRTs YOU acquired  
3 or sold.

4 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
5 YOUR response.

6 **RESPONSE TO INTERROGATORY NO. 6:**

7 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
8 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
9 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
10 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
11 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
12 because it calls for downstream information concerning sales of CRTs by Plaintiff and such  
13 information is not relevant to the claims or defenses of any party. Plaintiff further objects to this  
14 interrogatory to the extent that it impermissibly seeks the premature and non-reciprocal disclosure  
15 of experts and expert information, or requires Plaintiff to set forth factual analyses, comparative  
16 analyses, opinions, or theories that may be the subject of expert testimony. Plaintiff also objects to  
17 this interrogatory to the extent it calls for disclosure of information that is protected by the  
18 attorney-client privilege, the work product doctrine, or is otherwise privileged or immune from  
19 discovery. Plaintiff further objects to this interrogatory on the ground that it is duplicative of other  
20 interrogatories served in this action. Finally, Plaintiff objects to this interrogatory to the extent it  
21 imposes obligations on Plaintiff beyond the scope of the Federal Rules of Civil Procedure 26 and  
22 34 and the applicable Local Rules of the United States District Court for the Northern District of  
23 California. Subject to, and without waiving these objections, Plaintiff's purchases of CRTs from  
24 the defendants may be derived from their production of documents.

25 **INTERROGATORY NO. 7:**

26 Separately for each DEFENDANT and "co-conspirator" alleged in the COMPLAINT,  
27 including without limitation their subsidiaries and affiliates, state for each calendar year of the  
28 RELEVANT PERIOD the gross dollar amounts, unit volumes, and types of CRT PRODUCTS

1 YOU acquired or sold.

2 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
3 YOUR response.

4 **RESPONSE TO INTERROGATORY NO. 7:**

5 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
6 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
7 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
8 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
9 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
10 because it calls for downstream information concerning sales of CRTs by Plaintiff and such  
11 information is not relevant to the claims or defenses of any party. Plaintiff further objects to this  
12 interrogatory to the extent that it impermissibly seeks the premature and non-reciprocal disclosure  
13 of experts and expert information, or requires Plaintiff to set forth factual analyses, comparative  
14 analyses, opinions, or theories that may be the subject of expert testimony. Plaintiff also objects to  
15 this interrogatory to the extent it calls for disclosure of information that is protected by the  
16 attorney-client privilege, the work product doctrine, or is otherwise privileged or immune from  
17 discovery. Plaintiff further objects to this interrogatory on the ground that it is duplicative of other  
18 interrogatories served in this action. Finally, Plaintiff objects to this interrogatory to the extent it  
19 imposes obligations on Plaintiff beyond the scope of the Federal Rules of Civil Procedure 26 and  
20 34 and the applicable Local Rules of the United States District Court for the Northern District of  
21 California. Subject to, and without waiving these objections, Plaintiff's purchases of CRT  
22 Products from the defendants may be derived from their production of documents.

23 **INTERROGATORY NO. 8:**

24 IDENTIFY each PERSON with knowledge of YOUR negotiations RELATING TO the  
25 terms and conditions for each of YOUR acquisitions or sales of CRTs during the RELEVANT  
26 PERIOD.

27 **RESPONSE TO INTERROGATORY NO. 8:**

28 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff

1 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
2 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
3 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
4 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
5 because it calls for downstream information concerning sales of CRTs by Plaintiff and such  
6 information is not relevant to the claims or defenses of any party. *See, e.g., In re Vitamins*  
7 *Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C. 2000); *In re Pressure Sensitive Labelstock Antitrust*  
8 *Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa. 2005). Plaintiff further objects to this interrogatory on  
9 the ground that it is duplicative of other interrogatories served in this action.

10 Subject to, and without waiving, the foregoing objections, Plaintiff responds with respect  
11 to their acquisition of CRT Products from defendants as follows: Radio & TV Equipment, Inc.  
12 did not purchase any CRTs during the RELEVANT PERIOD. It only purchased CRT  
13 PRODUCTS.

14 **INTERROGATORY NO. 9:**

15 IDENTIFY each PERSON with knowledge of YOUR negotiations RELATING TO the  
16 terms and conditions for each of YOUR acquisitions or sales of CRT PRODUCTS during the  
17 RELEVANT PERIOD.

18 **RESPONSE TO INTERROGATORY NO. 9:**

19 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
20 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
21 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
22 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
23 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
24 because it calls for downstream information concerning sales of CRTs by Plaintiff and such  
25 information is not relevant to the claims or defenses of any party. *See, e.g., In re Vitamins*  
26 *Antitrust Litig.*, 198 F.R.D. 296, 301 (D.D.C. 2000); *In re Pressure Sensitive Labelstock Antitrust*  
27 *Litig.*, 226 F.R.D. 492, 497-498 (M.D. Pa. 2005). Plaintiff further objects to this interrogatory on  
28 the ground that it is duplicative of other interrogatories served in this action.

1 Subject to, and without waiving, the foregoing objections, Plaintiff responds with respect  
2 to their acquisition of CRT Products from defendants as follows:

3 Bruce Holtan, President of Radio & TV Equipment, Inc.  
4 615 North Shore Drive  
5 Detroit Lakes, MN 56501

6 Randy Balzum, Former Sales Manager of Radio & TV Equipment, Inc.  
7 495 32nd Street North  
8 Moorhead, MN 56560

9 **INTERROGATORY NO. 10:**

10 IDENTIFY YOUR product specifications for each acquisition or potential acquisition of  
11 CRTs during the RELEVANT PERIOD, including without limitation all PERSONS with  
12 knowledge of those specifications.

13 **RESPONSE TO INTERROGATORY NO. 10:**

14 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff also  
15 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
16 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
17 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
18 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
19 on the ground that it is duplicative of other interrogatories served in this action. Subject to, and  
20 without waiving, the foregoing objections, Plaintiff responds as follows: Radio & TV Equipment,  
21 Inc. did not purchase any CRTs during the RELEVANT PERIOD. It only purchased CRT  
22 PRODUCTS.

23 In addition, the answer to this interrogatory may be derived from Plaintiff's production of  
24 documents.

25 **INTERROGATORY NO. 11:**

26 IDENTIFY YOUR product specifications for each acquisition or potential acquisition of  
27 CRT PRODUCTS during the RELEVANT PERIOD, including without limitation all PERSONS  
28 with knowledge of those specifications.

**1    RESPONSE TO INTERROGATORY NO. 11:**

2            Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff also  
 3 objects to this interrogatory on the grounds that it is compound, vague and ambiguous, overly  
 4 broad and unduly burdensome. Plaintiff objects to this interrogatory on the grounds that it seeks  
 5 information entirely irrelevant to the issues raised and damages claimed in this case and is not  
 6 likely to lead to the discovery of admissible evidence. Plaintiff further objects to this interrogatory  
 7 on the ground that it is duplicative of other interrogatories served in this action. Subject to, and  
 8 without waiving, the foregoing objections, Plaintiff responds as follows: Radio & TV Equipment,  
 9 Inc. neither provided any product specifications nor defined any specifications for any acquisition  
 10 or potential acquisition of CRT PRODUCTS. Rather, Radio & TV Equipment, Inc. sold whatever  
 11 products Hitachi made available to it.

12            In addition, the answer to this interrogatory may be derived from plaintiff's production of  
 13 documents.

**14    INTERROGATORY NO. 12:**

15            Separately, with respect to each CRT that YOU acquired during the RELEVANT  
 16 PERIOD, state the total dollar amount by which YOU allege YOU were overcharged as a result of  
 17 the allegations in the Complaint.

18            As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
 19 YOUR response.

**20    RESPONSE TO INTERROGATORY NO. 12:**

21            Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
 22 objects to this interrogatory as being a premature contention interrogatory. *See In re Convergent*  
 23 *Technologies Securities Litig.*, 108 F.R.D. 328 (N.D. Cal. 1985) (“[t]here is considerable recent  
 24 authority for the view that the wisest general policy is to defer propounding and answering  
 25 contention interrogatories until near the end of the discovery period.”); *In re Ebay Seller Antitrust*  
 26 *Litig.*, No. C07-1882 JF (RS), 2008 WL 5212170 (N.D. Cal. Dec. 11, 2008) (“Courts using their  
 27 Rule 33(a)(2) discretion generally disfavor contention interrogatories asked before discovery is  
 28 undertaken.”). Discovery has just started, Defendants have not meaningfully responded to

1 Plaintiffs' discovery, and Plaintiffs have not taken any depositions (and are not permitted to take  
 2 depositions until November 1, 2010). Plaintiff further objects to this interrogatory to the extent  
 3 that it impermissibly seeks the premature and non-reciprocal disclosure of experts and expert  
 4 information, or requires Plaintiff to set forth factual analyses, comparative analyses, opinions, or  
 5 theories that may be the subject of expert testimony. Plaintiff further objects to this interrogatory  
 6 on the ground that it is vague, ambiguous, overbroad and unduly burdensome, and seeks material  
 7 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff  
 8 also objects to this interrogatory to the extent it calls for disclosure of information that is protected  
 9 by the attorney-client privilege, the work product doctrine, or is otherwise privileged or immune  
 10 from discovery. Finally, Plaintiff objects to this interrogatory to the extent it imposes obligations  
 11 beyond the scope of the Federal Rules of Civil Procedure 26 and 34 and the applicable Local  
 12 Rules of the United States District Court for the Northern District of California.

13 **INTERROGATORY NO. 13:**

14 Separately, with respect to each CRT PRODUCT that YOU acquired during the  
 15 RELEVANT PERIOD, state the total dollar amount by which YOU allege YOU were  
 16 overcharged as a result of the allegations in the Complaint.

17 As part of YOUR response, IDENTIFY each DOCUMENT that YOU contend supports  
 18 YOUR response.

19 **RESPONSE TO INTERROGATORY NO. 13:**

20 Plaintiff incorporates the General Objections as though fully set forth herein. Plaintiff  
 21 objects to this interrogatory as being a premature contention interrogatory. *See In re Convergent*  
 22 *Technologies Securities Litig.*, 108 F.R.D. 328 (N.D. Cal. 1985) ("[t]here is considerable recent  
 23 authority for the view that the wisest general policy is to defer propounding and answering  
 24 contention interrogatories until near the end of the discovery period."); *In re Ebay Seller Antitrust*  
 25 *Litig.*, No. C07-1882 JF (RS), 2008 WL 5212170 (N.D. Cal. Dec. 11, 2008) ("Courts using their  
 26 Rule 33(a)(2) discretion generally disfavor contention interrogatories asked before discovery is  
 27 undertaken."). Discovery has just started, Defendants have not meaningfully responded to  
 28 Plaintiffs' discovery, and Plaintiffs have not taken any depositions (and are not permitted to take

1 depositions until November 1, 2010). Plaintiff further objects to this interrogatory to the extent  
2 that it impermissibly seeks the premature and non-reciprocal disclosure of experts and expert  
3 information, or requires Plaintiff to set forth factual analyses, comparative analyses, opinions, or  
4 theories that may be the subject of expert testimony. Plaintiff further objects to this interrogatory  
5 on the ground that it is vague, ambiguous, overbroad and unduly burdensome, and seeks material  
6 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff  
7 also objects to this interrogatory to the extent it calls for disclosure of information that is protected  
8 by the attorney-client privilege, the work product doctrine, or is otherwise privileged or immune  
9 from discovery. Finally, Plaintiff objects to this interrogatory to the extent it imposes obligations  
10 beyond the scope of the Federal Rules of Civil Procedure 26 and 34 and the applicable Local  
11 Rules of the United States District Court for the Northern District of California.

12  
13 DATED: July 8, 2010

By: /s/ Guido Saveri  
SAVERI & SAVERI, INC.  
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San Francisco, CA 94111  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813

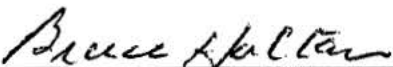
*Interim Lead Counsel for the Direct  
Purchaser Plaintiffs*

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## **VERIFICATION**

I, Bruce Holtan, am President of Radio & TV Equipment, Inc. I do hereby state, under penalty of perjury under the laws of the United States, that the responses contained in Plaintiff Radio & TV Equipment, Inc.'s Responses and Objections to Defendant Hitachi America, LTD.'s First Set of Interrogatories are true and correct to the best of my knowledge.

Executed on July 8, 2010.

  
\_\_\_\_\_  
Signature